

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CASE NO. 4:20-CR-00212-ALM
	§	
DEBRA LYNN MERCER-ERWIN (1)	§	
KAYLEIGH MOFFETT (2)	§	
GUILLERMO GARCIA MENDEZ (3)	§	
FEDERICO ANDRES MACHADO (4)	§	
CARLOS ROCHA VILLARRUTIA (5)	§	
ALBAN GERARDO AZOFEIFA-CHACON (6)	§	
AARON BELLO-MILLAN (7)	§	
MICHAEL ASSAD MARCOS (8)	§	

**ITRC, LLC AND LEARJET 31A BEARING SERIAL NUMBER 080 AND ASSIGNED  
AND DISPLAYING REGISTRATION/TAIL NUMBER N260RC'S NOTICE  
OF WITHDRAWAL OF MOTION TO DISMISS CRIMINAL FORFEITURE ACTION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW ITRC, LLC and Learjet 31A Bearing Serial Number 080 and Assigned and Displaying Registration/Tail Number N260RC, and file this Notice of Withdrawal of Motion to Dismiss, and would respectfully show the Court as follows:

On March 22, 2021, ITRC, LLC and Learjet 31A Bearing Serial Number 080 and Assigned and Displaying Registration/Tail Number N260RC filed a Motion to Dismiss Criminal Forfeiture Action (Doc. 168). On April 5, 2021, the United States of America filed its Response in Opposition to Intervenor's Motion to Dismiss (Doc. 190). On April 12, 2021, ITRC, LLC and Learjet 31A Bearing Serial Number 080 and Assigned and Displaying Registration/Tail Number N260RC filed their Reply in Support of Motion to Dismiss Criminal Forfeiture Action (Doc. 195).

By agreement of the parties, ITRC, LLC and Learjet 31A Bearing Serial Number 080 and Assigned and Displaying Registration/Tail Number N260RC hereby withdraw their Motion to Dismiss Criminal Forfeiture Action, and would notify the Court that there is no need for the

hearing on the Motion to Dismiss Criminal Forfeiture Action as scheduled at 11:15 a.m. on May 3, 2021.

Dated: April 30, 2021

Respectfully submitted,

**MARTIN & DROUGHT, P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

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